

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

JOHN MICHAEL BRADLEY, AKA J.
MICHAEL BRADLEY, AKA MICHAEL
BRADLEY, AKA MIKE BRADLEY AND
REBECCA S. BRADLEY

Debtor(s)

JOHN MICHAEL BRADLEY, AKA J.
MICHAEL BRADLEY, AKA MICHAEL
BRADLEY, AKA MIKE BRADLEY AND
REBECCA S. BRADLEY

Plaintiff(s)/Movant(s)

vs.

USA, ACTING THROUGH USDA, FARM
SERVICE AGENCY, PENNSYLVANIA
DEPARTMENT OF REVENUE, OCWEN LOAN
SERVICING, LLC, ET AL

Defendant(s)/Respondent(s)

CHAPTER 12

CASE NO. 4 - 15 .bk- 01370

ADVERSARY NO. - ap-
(if applicable)

Nature of Proceeding: Motion to Sell

Real Estate

Document #: 55

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The Debtors' attorney and Mario Hanyon, Esquire, the attorney for the Bank of New York, are requesting a continuance of 2-4 weeks to allow for ongoing settlement discussions.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 1/25/18

s/John A. DiGiamberardino, Esquire

Attorney for DEBTOR

Name: John A. DiGiamberardino, Esquire

Phone Number: 610-372-9900

¹ No alterations or interlineations of this document are permitted.